

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

**Prosecution Notification
to the Court**

20 April 2012

The United States responds to the Court's Order, dated 23 March 2012 as follows:

1. **Hard Drive Searches.** The Computer Crimes Investigative Unit (CCIU) conducted a review pursuant to the Court's order. Based on input from the government security expert, the United States could not determine the classification of 460 filenames in Attachment 4 because they were written in Arabic; therefore, this information has been redacted from the attachment.¹ Below is a summary of their findings and attached are the Agent's Investigation Reports:

a. Of the fourteen hard drives, only four were found to contain valid file systems, the remaining drives were blank, contained no accessible data, or were inoperable.

b. The VLC application was installed on Items 1 and 11.

c. The M-IRC application was installed in several locations on Items 1 and 11.

d. The Media Player Classic application was installed on Item 11.

e. Audio and video files of apparent entertainment values were identified on the examined images.

2. The prosecution contacted the DOS, FBI, CIA, DIA, and ONCIX to determine whether these agencies contain any forensic results or investigative files relevant to this case.²

(1) **DOS.** DOS has forensic results and investigative files. The United States reviewed this information for evidence that is favorable to the accused and material to either guilt or punishment. Additionally, prior to the Court's order, the United States produced this information to the defense.

(2) **FBI.** FBI has forensic results and investigative files. The United States is reviewing this information for evidence that is favorable to the accused and material to either guilt or

¹ The United States is diligently working to determine who can provide translation of these Arabic names.

² On 16 April 2012, the Court granted the Government's motion for leave of the Court to extend the time to respond from 20 April 2012 to 2 May 2012 as to whether the CIA will release classified information in original form, provide for limited disclosure under MRE 505(g)(2), or invoke the classified information privilege under MRE 505(c).

punishment. Additionally, prior to the Court's order, the United States started producing this information to the defense.

(3) **DIA.** DIA does not have any forensic results or investigative files.

(4) **ONCIX.** ONCIX does not have any forensic results or investigative files.

3. At this time, the United States anticipates that the **FBI** is the only government entity that is a custodian of classified forensic results or investigative files relevant to this case that will seek limited disclosure IAW MRE 505(g)(2).

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line.

ASHDEN FEIN
MAJ, JA
Trial Counsel